

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:20 CR 00287-JAR
)	
LORENZO YOUNG,)	
)	
Defendant.)	

SENTENCING MEMORANDUM AND REQUEST FOR DOWNWARD VARIANCE

COMES NOW Lorenzo Young, by and through his Attorney, Assistant Federal Public Defender, Tyler Morgan, and offers the following information in support of his request for a downward variance from the Sentencing Guidelines range and specifically for a sentence between eighty-four (84) months and one day and ninety-six (96) months incarceration.

On June 7, 2020, Lorenzo Young was nineteen years old when he was arrested for the offense underlying this case. It was also the day his mother died. He sits in jail today, age twenty-one, facing his first prison sentence and wondering what the rest of his life will hold, hoping it is different from what he has known. Lorenzo is a young man with a unique situation who is poised for change.

The Child of a Drug Addict

Lorenzo's life thus far has been defined by being the child of a drug-addicted mother. His life has been a certain way not just because he is the child of a drug addict but because he has lived almost his whole life under the same roof with his drug-addicted mother. Lorenzo's mother, Diahanne (*pronounced Dee-on*) Greenlee, had eight children, seven of whom were raised by others due to Diahanne's inability to care for her children. Diahanne's youngest child is Lorenzo. Lorenzo is the only child of his mother with a father different from his siblings, and he is the only child of his mother who lived with his mother while growing up.

Lorenzo was raised with his cousin, Justin Gillette, who "was with Lorenzo from the day Lorenzo was born."¹ Justin, who is like a brother to Lorenzo, is 6 years older than Lorenzo and the son of Diahanne's Aunt Pamela (making Justin Diahanne's much younger cousin). For the first years of Lorenzo's life, these four lived together – the two moms and their sons. At one point, the four lived in a house together, with Lorenzo and his mom living in the basement apartment and Justin and his mom living upstairs. Justin recalls how Lorenzo's mom would sneak out through a door in the basement to feed her drug habit. Multiple times every week, Justin and his mother would realize Diahanne had left again when they would hear baby Lorenzo crying behind the basement door, realizing he was alone.

¹ Phone interview with Justin Gillette. Other Information and quotes attributed to Mr. Gillette throughout this Memo are also from the phone interview.

As time went on, Aunt Pamela tired of Diahanne's drug addiction and moved out. This is when life got really rough for Lorenzo. Although a kid himself, Justin was so attached to Lorenzo that he chose to stay with Diahanne instead of moving with his own mother (and it didn't hurt that he was a self-described "hard-headed teenager" and liked the idea of having less rules at Diahanne's house). By the time Lorenzo was ten, the three had moved to a house in Baden. Justin continued to be Lorenzo's safety net and take care of him the best he could. Justin recalls "pretty much [Lorenzo's] whole middle school life we had no food, no lights, no hot water; we were taking care of ourselves.....we went through hell." Justin tried to pay bills using money he received from social security due to his father's death. But, Lorenzo and Justin survived by learning the streets from Lorenzo's mom; Diahanne taught the boys how to "hustle," the only way she knew how to live and how she supplied her drug habit. Lorenzo's childhood was chaotic at best and he lacked the nurture and care of an adult which helps a child thrive and become a productive member of society.

Living in a gang-ridden and violent neighborhood such as Baden did not help matters. Justin recalls trying to do his best for Lorenzo to keep him from falling into the streets. When Justin graduated in 2013 from Sumner High School, Lorenzo was just thirteen. Justin recalls times where he would "go out and pluck Lorenzo up from the streets" when he would learn Lorenzo was up to no good. Age thirteen was also when Lorenzo lost his oldest brother who he looked up to, Quintyn (age twenty-nine when he died), to street violence. Quintyn's murder was particularly devastating because he was killed by his own best friend who turned on him. Justin explains that

Lorenzo was not a bad kid and that he is not a bad person, “but when you come up rough with nothing and your friends come around and have stuff and want you to do bad things, well.....(*pause*) we never had anything.” Justin also explains that because he was older than Lorenzo, he didn’t always know what was going on with Lorenzo’s age group and friends. Justin was worried about Lorenzo and suggested he get out of the neighborhood.

A Chance to Make It

When asked why things went wrong for Lorenzo, Justin responded, “His Daddy was never around, his Mama was on drugs, and his big brother got murdered.” Since Lorenzo had no parent taking care of him and Justin questioned his continued ability to raise Lorenzo, Justin thought it was a good idea for him and Lorenzo to move to North County to live with Lorenzo’s older brother, Orlando Greenlee.

Life with Orlando was sure to be very different from life with Lorenzo’s mom. Orlando and brother Deion were raised by their paternal grandfather, who was a veteran, a pastor, and also worked for Bistate. Orlando and Deion were provided a safe, loving and grounded upbringing, which could not have been more different from how Lorenzo had been brought up the first fifteen years of his life. Orlando lived a clean life, worked hard, and was a newlywed. Orlando and his new wife, Jelisa, welcomed Justin and 15-year-old Lorenzo into their home. Justin recalls how Orlando had Lorenzo “straightened out”, meaning Orlando had Lorenzo in school (a better school than what Lorenzo had known previously), he took Lorenzo to church with him, and he also got Lorenzo a job helping him work for his wife’s family’s

cleaning company. Lorenzo initially responded well, keeping up with his schoolwork and even joining the football team. While it seemed like Lorenzo's life was going to improve, this was not to be the case. Ultimately, it was too hard to erase what had been instilled in Lorenzo over the years of being with his mom, day in and day out. Not only did he miss his mother, he had a hard time accepting Orlando as an authority figure. Lorenzo rebelled against what he viewed as Orlando trying to be his dad. After approximately two years, Lorenzo left his brother's house and moved back with his mom. Today, Orlando sadly recalls, "At that time, I wanted more for [Lorenzo] than he wanted for himself."

June 7, 2020

In the six weeks leading up to June 7, 2020, Diahanne Greenlee overdosed approximately four times. Her final overdose on June 7th is the one that took her life. Several weeks before that fateful day, Lorenzo, suspecting his unresponsive mother of overdosing, broke down her bedroom door to reach her. He called 9-1-1 and saved her life. Lorenzo does not open up easily about his past or his mother's addiction. It is hard to know how many times he has witnessed his mother in peril. After so many years watching his mother's addiction first-hand, he knew she needed protection from her disease. On the evening of June 6th, Lorenzo and his mother had an argument and she kicked him out of the house without his keys. Lorenzo spent the night with other family and tried unsuccessfully throughout the night to reach his mom by phone. No one in the family could reach her. The next morning, June 7th, Lorenzo, along with Justin, went to his mom's house. The two frantically beat

on her door and windows but there was no response. They waited about an hour, hoping someone would drop her off. As they both tell the story now, even though there was no confirmation of this fact, they both had a feeling, and they both just “knew”—Lorenzo’s mother was dead. It felt different than her previous overdoses they had both endured over the years. They left her house with little hope that she was still alive. Justin dropped Lorenzo at a friend’s house and that was the last time he saw Lorenzo.

Later on June 7th, Lorenzo encountered his codefendant, Jaden Allen. They ended up taking pills and getting high together, something that Lorenzo got from his mother as a way to cope with anxiety, anger, and sadness. Already in an unstable mental state with the belief that his mother was dead, the drugs took him to an even darker place. When the idea to rob the victim for his vehicle came about, Lorenzo lacked the capacity or care to say no. He knew his mother was dead and that, combined with his youthful impulsivity and altered state of mind, resulted in his inability to see or care about what the next day would bring and the possible consequences of his actions. It was around this time that he and Jaden approached the victim, pointed the firearm at him, and retrieved the victim’s keys. Lorenzo was the driver and Jaden was the passenger. He thought they might get away; however, the police were quickly alerted to his presence in the vehicle. Police began trailing him, but in Lorenzo’s mind, how could the night get any worse? So he continued to drive away at a high rate of speed until he ultimately lost control of the vehicle, crashed, and was apprehended. As he was being booked, the police could see that

Lorenzo was likely under the influence of a controlled substance. One officer had to hold Lorenzo's head up to take his booking photo as her was unable to do so on his own (Attachment A). Eventually, Lorenzo came down and it was then that the gravity of what he had done finally hit him.

He was transferred to federal custody on June 9, 2020. It was on that day that the family confirmed what Lorenzo already knew. They finally located Diahanne Greenlee in the hospital morgue. Justin was the one to inform Lorenzo about the news—the news they both knew in their hearts two days earlier. It was further confirmed that Diahanne had passed away from a fentanyl overdose (Attachment B). To top it all off, Lorenzo was unable to see his mother one last time at the funeral, so lasting image that he has of his mother is her angrily kicking him out of the house the day before she died. This has weighed tremendously on him during his time in custody.

Poised For Change

Lorenzo Young is ready to change his life. He had an opportunity once before and he lacked the maturity and resilience to make the change that others so badly wanted for him. He is older now. He has lost both of his parents (his father, Lorenzo Young, Sr., passed away on May 4, 2021 due to unknown causes). The impact of his mother's death has been tremendous. While he is devastated by her loss, he also understands that his life does not have to be constrained any longer by his mother's suffering, addiction, and negative influence. It will take Lorenzo time to grieve his mother's loss, but one of the best things he has now is hope for a brighter future.

While others may not know how to move forward, Lorenzo has seen what life for him can be like. He has seen the life his brother and sister-in-law lead and he is also inspired by Justin, who is doing well living and working in Texas and taking care of his children. He is aware that the worst mistake he made was not staying with Orlando and instead moving back in with his mom.

A sentence between eighty-four (84) months and one day and ninety-six (96) months—seven years and one day to eight years—while a substantial downward variance, would nonetheless be sufficient, but not greater than necessary, to comply with the purposes of sentencing set forth in 18 U.S.C. § 3553(a). A sentence within that range would reflect Lorenzo’s lack of a juvenile or adult criminal history at the time of the instant offense. The time would reflect the serious nature of the offense, promote respect for the law, and provide just punishment for the offense. It would be sufficient time to provide Lorenzo with needed educational and vocational training while in the Bureau of Prisons to ensure that he is a productive member of society upon his release. Finally, it would promote parity between Lorenzo and codefendant Allen and avoid an unwanted sentencing disparity between the two—while the details of codefendant Allen’s plea agreement are unknown, the government dismissed one of the two counts against him, effectively opening the opportunity for codefendant Allen to be sentenced to a significantly lower term of incarceration than Lorenzo even though the Presentence Investigation Report characterizes them as equally culpable.

Lorenzo Young stands before this Honorable Court as a young, first-time offender, with hope for change. Upon being incarcerated for this offense, his life changed drastically. He intends to serve his term of imprisonment and then surround himself with those who will support him and help him make the changes he is so ready to make. He plans to live with his brother Orlando and Orlando's family. He is ready for change and has hope for the future. Because of Lorenzo's unique history and characteristics, and for all the foregoing reasons, a sentence that varies downward from the sentencing guidelines is believed to be the sentence that is sufficient but not greater than necessary to achieve the sentencing objectives required to be considered by the Court.

Respectfully submitted,

/s/ Tyler Keith Morgan

TYLER KEITH MORGAN

Assistant Federal Public Defender

1010 Market Street, Suite 200

St. Louis, Missouri 63101

Telephone: (314) 241-1255

Fax: (314) 421-3177

E-mail: Tyler.Morgan@fd.org

ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on August 23, 2021, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon James Redd, Assistant United States Attorney.

/s/Tyler Keith Morgan

TYLER KEITH MORGAN

Assistant Federal Public Defender